

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

**PROMESA
Title III**

Case No. 17-BK 3283 (LTS)

(Jointly Administered)

_____/

**NOTICE OF FILING OF FINAL FEE APPLICATION OF GENOVESE
JOBLOVE AND BATTISTA, P.A. AS SPECIAL LITIGATION COUNSEL TO
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD OF
APRIL 19, 2019 THROUGH DECEMBER 31, 2022**

PLEASE TAKE NOTICE that on November 15, 2022, pursuant to this Court's *Third Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* ("Interim Compensation Order") [ECF No. 20546]; Genovese Joblove & Battista, P.A. ("GJB"), as special litigation counsel to the Official Committee of Unsecured Creditors (the "Committee")², in the above-captioned Title III cases, filed the *Final Application of Genovese Joblove & Battista, P.A., as Special Litigation Counsel to Official Committee of*

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA

Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for Period from April 19, 2019 through December 31, 2022 (the “Application”).

PLEASE TAKE FURTHER NOTICE that any response or objection (“Objections”) to the Application by any party other than the Fee Examiner must be (a) in writing, (b) shall conform to the Federal Rules of Bankruptcy Procedure, the Interim Compensation Order, and the last Amended Case Management Procedures; and (c) be filed with the Court and served on the entities below, so as to be received on or before **August 10, 2023 at 3:00 p.m. (ET) / 4:00 p.m. (AST)** (the “Objection Deadline”):

- a. Chambers of the Honorable Laura Taylor Swain, United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Suite No. 3212, New York, New York 10007-1312
- b. The Financial Oversight and Management Board, c/o Proskauer Rose LLP, Eleven Times Square, New York, NY 10036, Attn: Martin J. Bienenstock, (mbienenstock@proskauer.com) and Ehud Barak, (ebarak@proskauer.com), and Proskauer Rose LLP, 70 West Madison Street, Chicago, IL 60602, Attn: Paul V. Possinger, Esq. (ppossinger@proskauer.com);
- c. Attorneys for the Financial Oversight and Management Board as representative of The Commonwealth of Puerto Rico, O’Neill & Borges LLC, 250 Muñoz Rivera Ave., Suite 800, San Juan, PR 00918-1813, Attn: Hermann D. Bauer, Esq. (Hermann.bauer@oneillborges.com);
- d. Attorneys for Puerto Rico Fiscal Agency and Financial Advisory Authority, c/o Marini Pietrantonio Muniz LLC, MCS Plaza, Suite 900, 250 Ponce de León Ave., San Juan P.R. 00918, Attn.: Luis C. Marini-Biaggi, Esq. (lmardini@mpmlawpr.com) and Carolina Velaz Rivero Esq., (cvelaz@mpmlawpr.com); Ivan Garau-Gonzalez, Esq., (igarau@mpmlawpr.com)
- e. Puerto Rico Fiscal Agency and Financial Advisory Authority, c/o O’Melveny & Myers LLP, Times Square Tower, 7 Time Square, New York, NY 10036, Attn: John J. Rapisardi, Esq. (jrapisardi@omm.com), Suzanne Uhland, Esq. (suhland@omm.com), and Diana M. Perez, Esq. (dperez@omm.com);
- f. The Office of the United States Trustee for the District of Puerto Rico, Attn: Monsita Lecaroz, Esq, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, Puerto Rico, 00901. (monsita.lecaroz@usdoj.gov);
- g. The Official Committee of Unsecured Creditors, c/o Paul Hastings LLP, 200 Park

Ave., New York, NY 10166, Attn: Luc A. Despins, Esq. (lucdespins@paulhastings.com);

h. The Official Committee of Unsecured Creditors, Casillas, Santiago & Torres LLC, El Caribe Office Building, 53 Palmeras Street, Ste. 1601, San Juan, PR 00901, Attn: Juan J. Casillas Ayala, Esq. (jcasillas@cstlawpr.com); Diana M. Battlle-Barasorda, Esq. (dbattle@cstlawpr.com); Alberto J.E. Añeses Negrón, Esq. (aaneses@cstlawpr.com); and Ericka C. Montull-Novoa, Esq. (emontull@cstlawpr.com);

i. The Official Committee of Retired Employees, c/o Jenner & Block LLP, 919 Third Ave., New York, NY 10022, Attn: Robert Gordon, Esq. (rgordon@jenner.com); Richard Levin, Esq. (rlevin@jenner.com); and Catherine Steege, Esq. (csteege@jenner.com);

j. The Official Committee of Retired Employees, c/o Bennazar, García & Milián, C.S.P., Edificio Union Plaza, PH-A, 416 Ave. Ponce de León, Hato Rey, PR 00918, Attn: A.J. Bennazar Zequeira, Esq. (ajb@bennazar.org);

k. The Puerto Rico Department of Treasury, P.O. Box 9024140, San Juan, Puerto Rico 00902. Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting (Reylam.Guerra@hacienda.pr.gov); Omar E. Rodríguez Pérez, CPA, Assistant Secretary of Central Accounting (Rodriguez.Omar@hacienda.pr.gov); Angel L. Pantoja Rodríguez, Deputy Assistant Secretary of Internal Revenue and Tax Policy (angel.pantoja@hacienda.pr.gov); Francisco Parés Alicea, Assistant Secretary of Internal Revenue and Tax Policy (francisco.pares@hacienda.pr.gov); and Francisco Peña Montañez, CPA, Assistant Secretary of the Treasury (Francisco.Pena@hacienda.pr.gov);

l. Counsel to any other statutory committee appointed;

m. The Fee Examiner, c/o EDGE Legal Strategies, PSC, 252 Ponce de León Avenue, Citibank Tower, 12th Floor, San Juan, PR 00918, Attn: Eyck O. Lugo (elugo@edgelegalpr.com); and Godfrey & Kahn, S.C., One East Main Street, Suite 500, Madison, WI 53703, Attn: Katherine Stadler (KStadler@gklaw.com).

n. Puerto Rico Fiscal Agency and Financial Advisory Authority, Roberto Sánchez Vilella (Minillas) Government Center, De Diego Ave. Stop 22, San Juan, Puerto Rico 00907, Carlos Saavedra, Esq. (Carlos.Saavedra@aafaf.pr.gov); Rocio Valentin, Esq. (Rocio.valentin@aafaf.pr.gov)

PLEASE TAKE FURTHER NOTICE the date of the hearing at which the Application shall be considered by the Court is December 6, 2023 at 8:30 a.m. (ET) / 9:30 a.m. (ATS) or at such other time as ordered by the Court and will be held before the Honorable Laura Taylor Swain, United States District Court Judge, in Room 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, Office 150, San Juan, Puerto Rico

00918-1767

PLEASE TAKE FURTHER NOTICE that if (a) no objection is timely filed and served in accordance with the Interim Compensation Order and Case Management Procedures, and (b) all issues raised by the Fee Examiner are consensually resolved, the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in these Title III cases are available (a) free of charge by visiting <https://cases.primeclerk.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court's website at <https://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.

Dated: July 21, 2023.

/s/ Mariaelena Gayo-Guitian

GENOVESE JOBLOVE & BATTISTA, P.A.

John H. Genovese, Esq. (*Pro Hac Vice*)

Mariaelena Gayo-Guitian, Esq. (*Pro Hac Vice*)

100 SE 2nd Street, Suite 4400

Miami, FL 33131

Telephone: (305) 349-2300

jgenovese@gjb-law.cdom

mguitian@gjb-law.com

*Special Litigation Counsel to the Official Committee of
Unsecured Creditors*

/s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC

Juan J. Casillas Ayala, Esq. (USDC - PR 218312)

Israel Fernández Rodríguez, Esq. (USDC - PR 225004)

Juan C. Nieves González, Esq. (USDC - PR 231707)

Cristina B. Fernández Niggemann, Esq. (USDC-PR 306008)

PO Box 195075

San Juan, Puerto Rico 00919-5075

Telephone: (787) 523-3434 Fax: (787) 523-3433

jcasillas@cstlawpr.com

ifernandez@cstlawpr.com

jnieves@cstlawpr.com

crernandez@cstlawpr.com

*Local Counsel to the Official Committee of Unsecured
Creditor.*